

## **Exhibit 2**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT  
BRIDGEPORT DIVISION**

In re:

HO WAN KWOK, *et al.*,

Debtors.<sup>1</sup>

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: Chapter 11

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: Case No. 22-50073 (JAM)

:

: Jointly Administered

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**SECOND INTERIM FEE APPLICATION COVER SHEET**

Interim Application of:

Paul Hastings LLP

Time Period:

From: March 1, 2023 To: June 30, 2023

Bankruptcy Petition Filed:

February 15, 2022 (main chapter 11 case)

Date of Entry of Retention Orders:

August 2, 2022 [Docket No. 668] (effective as of July 8, 2022, as to Individual Debtor) and January 24, 2023 [Docket No. 1376] (effective as of October 11, 2022, as to Genever (BVI) and effective as of November 3, 2022, as to Genever (US))

**Amounts Requested**

Fees:	\$8,037,720.00 <sup>2</sup>
Expenses:	\$213,914.83
<b>Total:</b>	<b>\$8,251,634.83</b>

**Reductions**

Voluntary Fee Reductions: \$138,542.25

Voluntary Expense Reductions: \$2,395.80

**Fees Previously Requested:**

Requested Fees:	\$12,410,172.26
Awarded Fees:	\$11,860,172.26
Paid Fees:	\$11,776,802.00

**Retainer Request:**

None

**Expenses Previously Requested:**

Requested Expenses:	\$412,445.29
Awarded Expenses:	\$412,445.29
Paid Expenses:	\$412,445.29

**Expense Detail:**

Retainer Received: Not applicable

Copies per page cost and total:	\$0.08 b/w (per page)
	\$0.20 color (per page)
	\$20,481.56 (total)

<sup>1</sup> The Debtors in these chapter 11 cases are Ho Wan Kwok (also known as Guo Wengui, Miles Guo, and Miles Kwok, as well as numerous other aliases) (last four digits of tax identification number: 9595), Genever Holdings LLC (last four digits of tax identification number: 8202) and Genever Holdings Corporation. The mailing address for the Trustee, Genever Holdings LLC, and the Genever Holdings Corporation is Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 c/o Luc A. Despins, as Trustee for the Estate of Ho Wan Kwok (solely for purposes of notices and communications).

<sup>2</sup> While this Application seeks allowance of \$8,037,720.00 in fees incurred during the Fee Period (net of a \$20,096.25 credit, as further detailed below), Paul Hastings has agreed with the U.S. Trustee and the Committee that it would only request, at this time, payment of 80% of its fees, with a 20% holdback.

Application, Paul Hastings requests allowance and payment<sup>2</sup> of the compensation for professional services performed by Paul Hastings attorneys (including the Trustee<sup>3</sup>) and reimbursement of its actual and necessary expenses incurred during the period from March 1, 2023 through and including June 30, 2023 (the “Fee Period”). In support of this Application, Paul Hastings respectfully states as follows:

**PRELIMINARY STATEMENT**

1. Upon the Trustee’s appointment on July 8, 2022, the Trustee and Paul Hastings immediately embarked on an investigation into the financial affairs of the Individual Debtor and his corporate “shell game” to shield companies and assets under his ownership and/or control from his creditors. Given the vast network of companies affiliated with the Individual Debtor, and the fact that these companies or their assets are located around the world, the Trustee’s investigation was, and continues to be, extensive. For example, to date, the Trustee’s investigation has included, among other things, (a) seeking discovery under Bankruptcy Rule 2004 from hundreds of individuals and entities connected with the Individual Debtor and his various businesses, (b) analyzing thousands of documents produced in response to the Trustee’s Rule 2004 subpoenas, (c) deposing several targets of the Trustee’s Rule 2004 discovery, (d) interviewing former employees and business associates of the Individual Debtor (including several communications with confidential informants), (e) researching property records, and (f) pursuing litigation to recover property of the estate.

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<sup>2</sup> While this Application seeks allowance of all fees incurred during the Fee Period, as per Paul Hastings’ agreement with the U.S. Trustee and the Committee, Paul Hastings is only requesting, at this time, payment of 80% of the fees incurred, with a 20% holdback.

<sup>3</sup> In accordance with the Retention Order (as defined below), the Trustee is authorized to act as one of the attorneys for the Individual Debtor’s estate, and, accordingly, this Application also seeks allowance of the Trustee’s fees in such capacity. For the avoidance of doubt, in this Application, references to services provided by Paul Hastings attorneys shall include the Trustee. To be clear, time spent by the Trustee in his capacity as chapter 11 trustee, is not part of this Application, and compensation therefor will be sought by separate application.

to pending adversary proceedings, (iii) maintaining a tracking chart with respect to the pending appeals in these cases, and (iv) generally reviewing and analyzing pleadings filed in adversary proceedings.

D. Non-Working Travel (Task Code B195) [billed at 1/2 rate]  
Fees: \$ 22,030.25 Total Hours: 28.90

58. During the Fee Period, Paul Hastings attorneys traveled to (a) the Federal Courthouse in Bridgeport, Connecticut for various hearings related to the Trustee's Rule 2004 investigation and the Lady May, (b) the New York offices of the U.S. Department of Justice (the "U.S. DOJ") for meetings with U.S. DOJ personnel, and (c) Washington, D.C., to conduct depositions in connection with the Trustee's Rule 2004 investigation.

E. Business Operations (Task Code B210)  
Fees: \$260,196.50 Total Hours: 184.80

59. During the Fee Period, Paul Hastings attorneys handled numerous matters related to the operation and maintenance of the Lady May and the Lady May II, including (a) ensuring a smooth transition of ownership of the Lady May and Lady May II from HK USA to the Trustee, (b) securing insurance coverage for the Lady May and Lady May II (as the certain of the prior insurance policies were set to expire at the end of March 2023, without the possibility of renewal), (c) obtaining a modification to the Repair Reserve Order so as to provide \$500,000 in funding for the operation and maintenance of the Lady May and Lady May II, (d) obtaining court authorization to enter into various agreements related to the operation and maintenance of the Lady May and the Lady May II, including a yacht management agreement with Yachtzoo Sarl ("Yachtzoo"), the yacht manager for the Lady May and Lady May II, and various dockage agreements, (e) coordinating with Yachtzoo regarding the maintenance and operation of the Lady May and the Lady May II, and (f) obtaining court authorization to transfer the Lady May

72. Finally, Paul Hastings attorneys engaged in numerous other investigation-related tasks, including the following:

- communicating with the U.S. DOJ regarding the Individual Debtor's criminal proceedings and the assets seized in connection with his arrest;
- preparing the Trustee's response, dated March 7, 2023 [Docket No. 1517], to the declaration of Lee Vartan (counsel to HK USA and Mei Guo) addressing HK USA's and Mei Guo's purported compliance with this Court's order granting the Trustee's motion to compel compliance with the Trustee's Rule 2004 subpoenas;
- Deposing (a) Valerie Steven and Mark Harmon of Hodgson Russ LLP, which was counsel to the Individual Debtor between 2018 and 2020, and (b) Jerry Shulman of Williams & Connolly LLP, which was counsel to the Individual Debtor in 2015;
- Analyzing relationship between the Individual Debtor and hundreds of companies affiliated with the Individual Debtor; and
- Researching property records.

H. Contempt Proceedings (Task Code B262)  
Fees: \$28,081.50 Total Hours: 20.00

73. On March 10, 2023, the Court entered the HK Parties Contempt Order [Docket No. 1537] holding the HK Parties (*i.e.*, HK USA, Ms. Guo, and attorney Lee Vartan) in contempt and directing them, jointly and severally, to compensate the Trustee and his counsel, Paul Hastings, for reasonable attorneys' fees and expenses associated with the Trustee's efforts to secure compliance with the subpoenas. On April 10, 2023, the Trustee and Paul Hastings filed their Special Fee Application seeking payment of \$83,370.26 from the HK Parties with respect to fees incurred during the period from September 28, 2023 through March 10, 2023 (*i.e.*, the date the Court entered the HK Parties Contempt Order). The Court granted the Special Fee

### III. Other Litigation (Matter ID 00003)<sup>28</sup>

#### A. Court Hearings (Task Code B155) Fees: \$9,634.50 Total Hours: 8.20

76. During the Fee Period, the Paul Hastings attorneys attended various hearings related to the Individual Debtor's criminal proceedings, including:

- The March 15, 2023 hearing on the arrangement of the Individual Debtor in the United States District Court for the Southern District of New York; and
- The April 4, 2023 bail hearings with respect to the Individual Debtor and Yvette Wang.

#### B. General Litigation (Task Code B191) Fees: \$60,704.00 Total Hours: 61.10

77. During the Fee Period, Paul Hastings attorneys assisted the Trustee on various litigation-related matters (other than the adversary proceeding pending in these chapter 11 cases). First, as the Court is well aware, on March 15, 2023, the Individual Debtor and Yvette Wang were arrested by federal law enforcement authorities. Paul Hastings attorneys monitored these criminal proceedings and reviewed pleadings filed in these proceedings.

78. Second, in connection with these criminal proceedings, the Trustee received a document subpoena from the U.S. DOJ, requesting documents related to the Individual Debtor. In response to that subpoena, Paul Hastings conducted a review of the documents produced to the Trustee during his Rule 2004 investigation. Paul Hastings transmitted the Trustee's document production to the U.S. DOJ on April 24, 2023.

79. Third, on April 26, 2023, Jiaming Liu (who had previously been served with one of the Trustee's Rule 2004 subpoenas) commenced a lawsuit against the Trustee and Paul

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<sup>28</sup> As a general matter, time spent on litigation-related tasks other than adversary proceedings in these chapter 11 cases was tracked under Matter ID 00003.

Luc Despins as Chapter 11 Trustee in the case of Ho Wan  
 Kwok  
 50687-00002  
 Invoice No. 2366607

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/14/2023	DEB4	Correspond with J. Kuo regarding Mei Guo declaration	0.10	1,320.00	132.00
03/14/2023	DEB4	Correspond with [REDACTED] regarding recent Mei Guo production	0.10	1,320.00	132.00
03/14/2023	EE3	Research regarding real estate property	0.80	400.00	320.00
03/14/2023	ECS1	Investigate and review information regarding potential Kwok affiliated entities/individuals and assets, their connections to Kwok or his affiliates, and their corporate documents	0.70	1,015.00	710.50
03/14/2023	JKP1	Review ACASS Rule 2004 production for documents concerning sale of aircraft (.9); correspond with D. Barron regarding the same (.1)	1.00	915.00	915.00
03/14/2023	LM20	Review documents produced by Hodgson Russ	3.30	855.00	2,821.50
03/14/2023	LAD4	Call with DOJ (R. Finkel, J. Murray, M. Fergenson) and N. Bassett re: update on seizure	0.40	1,860.00	744.00
03/14/2023	NAB	Call with DOJ (R. Finkel, J. Murray, M. Fergenson) and L. Despins regarding seizure	0.40	1,625.00	650.00
03/15/2023	JK21	Correspond with E. Sutton regarding Kwok arraignment	0.40	540.00	216.00
03/15/2023	JKP1	Review debtor's Southern District of New York criminal indictment	0.40	915.00	366.00
03/15/2023	LM20	Review documents produced by Hodgson Russ	2.10	855.00	1,795.50
03/15/2023	NAB	Call with Debtor and counter-defendant counsel regarding Debtor's arrest (.1); correspond with A. Luft and L. Despins regarding same (.3); review indictment and SEC complaint (.8)	1.20	1,625.00	1,950.00
03/16/2023	AB21	Correspond with D. Barron regarding query from C. Daly regarding address for Q. Guo	0.10	1,625.00	162.50
03/16/2023	DEB4	Correspond with informant regarding information for investigation	0.10	1,320.00	132.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/16/2023	DEB4	Correspond with A. Bongartz regarding BVI entities	0.10	1,320.00	132.00
03/16/2023	DEB4	Correspond with L. Despins regarding Kwok passport allegations	0.10	1,320.00	132.00
03/16/2023	DEB4	Conference with J. Kosciewicz regarding discovery documents	0.10	1,320.00	132.00
03/16/2023	DEB4	Correspond with J. Kosciewicz regarding document searches among produced documents	0.10	1,320.00	132.00
03/16/2023	DEB4	Correspond with B. Kelly regarding LLC membership interest	0.10	1,320.00	132.00
03/16/2023	DEB4	Correspond with [REDACTED] regarding informant emails	0.10	1,320.00	132.00
03/16/2023	DEB4	Correspond with C. Daly regarding Princess Gate address	0.10	1,320.00	132.00
03/16/2023	EE3	Research information about luxury cars	0.80	400.00	320.00
03/16/2023	JK21	Review document production regarding Kwok related litigation	2.30	540.00	1,242.00
03/16/2023	JKP1	Review produced documents linking Qiang Guo with Princes Castle address (1.0); correspond with D. Barron regarding the same (.1)	1.10	915.00	1,006.50
03/16/2023	JKP1	Correspond with S. Phan regarding redactions search	0.20	915.00	183.00
03/16/2023	JKP1	Review Rule 2004 documents concerning the Debtor having multiple passports (1.0); correspond with D. Barron regarding the same (.2)	1.20	915.00	1,098.00
03/16/2023	JKP1	Review prior correspondence regarding redacted documents within Rule 2004 productions (.4); call with D. Barron regarding the same (.1); correspond with A. Luft regarding the same (.1)	0.60	915.00	549.00
03/16/2023	LAD4	T/c J. Murray & R. Finkel (DOJ) re: briefing on case and next steps (.40); review detention letter (.20)	0.60	1,860.00	1,116.00
03/16/2023	AEL2	Prepare rule 2004 discovery follow up plan	1.30	1,625.00	2,112.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/17/2023	SM29	Analyze forfeiture issues and related authority (1.0); call with L. Despins re same (.2)	1.20	1,320.00	1,584.00
03/18/2023	LAD4	Review recent developments and prepare notes for DOJ call (.90); handle call with N. Bassett and DOJ team (J. Murray, M. Fergenson, R. Finkel) re: our next steps and forfeiture issues (.30)	1.20	1,860.00	2,232.00
03/18/2023	LAD4	Review/comment on Lady May forfeiture issues	0.90	1,860.00	1,674.00
03/19/2023	DEB4	Correspond with L. Despins regarding Lady May 2	0.10	1,320.00	132.00
03/19/2023	DEB4	Correspond with L. Despins regarding investigation target	0.10	1,320.00	132.00
03/19/2023	DEB4	Correspond with [REDACTED] regarding investigation target	0.10	1,320.00	132.00
03/19/2023	DEB4	Correspond with L. Despins regarding journalist info	0.10	1,320.00	132.00
03/20/2023	DEB4	Correspond with N. Bassett regarding Wachen fees	0.10	1,320.00	132.00
03/20/2023	DEB4	Conferences with W. Zhuge regarding PRC witness	0.10	1,320.00	132.00
03/20/2023	DEB4	Conference with [REDACTED] regarding investigation target	0.20	1,320.00	264.00
03/20/2023	DEB4	Correspond with N. Bassett regarding Arizona farm	0.20	1,320.00	264.00
03/20/2023	DEB4	Conference with N. Bassett regarding investigation target	0.10	1,320.00	132.00
03/20/2023	DEB4	Correspond with W. Zhuge regarding PRC witness	0.10	1,320.00	132.00
03/20/2023	DEB4	Correspond with L. Despins regarding supplemental rule 2004 motion	0.10	1,320.00	132.00
03/20/2023	DEB4	Correspond with informants regarding investigation target	0.30	1,320.00	396.00
03/20/2023	DEB4	Prepare hearing notes on rule 2004 discovery	0.80	1,320.00	1,056.00